## NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE THAT, upon the annexed Declaration of Lorie E. Almon, Esq., together with Exhibits A through K annexed thereto; the Declaration of Barbara Cirkva; the Declaration of Stephanie Zernik; Defendant's Statement of Undisputed Material Facts Pursuant to Local Rule 56.1; Defendant's Memorandum of Law in Support of its Motion for Summary Judgment; and upon all of the papers and proceedings herein, Defendant Chanel, Inc. ("Chanel") will move this Court on a date and time to be set by the Court, before The Honorable Robert P. Patterson, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order: (i) granting Defendant's summary judgment dismissing the Complaint of Plaintiff Anu Allen in its entirety and granting Defendant's counterclaim for unjust enrichment pursuant to Federal Rule of Civil Procedure 56; and (ii) for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE THAT, in accordance with the Court's Order dated October 29, 2014, Plaintiff's opposition papers to Defendants' motion, if any, are due on or before December 8, 2014, and Defendant's reply papers, if any, are due on or before December 15, 2014.

Dated: November 13, 2014 New York, New York

## Respectfully submitted, SEYFARTH SHAW LLP

By: /s/ Lorie E. Almon

Lorie E. Almon lalmon@seyfarth.com Caitlin S. Ladd cladd@seyfarth.com 620 Eighth Avenue, 32nd Fl. New York, NY 10018 (212) 218-5500

Attorneys for Defendant Chanel, Inc.

**CERTIFICATE OF SERVICE** 

I, Lorie E. Almon, hereby certify that on November 13, 2014, I electronically filed true

and correct copies of the foregoing Notice of Motion for Summary Judgment; Declaration of

Lorie E. Almon, Esq., together with Exhibits A through K; Declaration of Barbara Cirkva;

Declaration of Stephanie Zernik; Defendant's Statement of Undisputed Material Facts Pursuant

to Local Rule 56.1; and Defendant's Memorandum of Law in Support of its Motion for

Summary Judgment, with the Clerk of the Court via the Court's CM/ECF system, which sent

notification of such filing to the following counsel of record for Plaintiff Anu Allen:

Christopher H. Thompson The Law Offices of Christopher Thompson 33 Davison Lane East West Islip, NY 11795

ctalawman@aol.com

/s/ Lorie E. Almon

Lorie E. Almon